

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

JASMINE MHREZ,

Plaintiff,

Case No.: 22-cv-2152

v.

RADIUS GLOBAL SOLUTIONS, LLC,

Defendant.

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**NOTICE OF REMOVAL**

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Radius Global Solutions, LLC (“RGS”), by its attorney, hereby removes this action from the Superior Court of New Jersey, Hudson County, to the United States District Court for the District of New Jersey. In support of this Notice of Removal, Defendant states as follows:

1. Plaintiff Jasmine Mhrez originally commenced this action by filing a Complaint against Defendant in the Superior Court of New Jersey, Hudson County, where it is presently captioned as *Jasmine Mhrez v. Radius Global Solutions, LLC*, Case No. HUD-L-000728-22. No further proceedings before the State court have occurred.

2. In the Complaint, Plaintiff alleges a statutory cause of action against Defendant. A true and correct copy of the State Court record is attached hereto as Ex.

“A.”

3. Plaintiff accuses Defendant of violating the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*

4. Defendant received Plaintiff's Summons with a copy of the Complaint on March 14, 2022.

5. This Court has jurisdiction over Plaintiff's claim pursuant to 28 U.S.C. §§ 1331 and 1441 in that the claim is founded upon a claim or right arising under the laws of the United States.

6. This Notice of Removal is timely, having been filed within thirty (30) days of the date on which Defendant received Plaintiff's Summons with a copy of the Complaint. See 28 U.S.C. § 1446.

7. Written notice of this Notice of Removal of this action is being immediately provided to the Superior Court of New Jersey, Hudson County. *See* Ex. "B."

8. Written notice of this Notice of Removal of this action is being caused to be served on the Plaintiff.

WHEREFORE, Defendant Radius Global Solutions, LLC gives notice that this action is removed from the Superior Court of New Jersey, Hudson County to the United States District Court for the District of New Jersey.

Dated: April 13, 2022

Respectfully submitted

/s/ Aaron R. Easley  
Aaron R. Easley, Esq. (#026151994)  
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*Attorney for Defendant,*  
*Radius Global Solutions, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 13<sup>th</sup> day of April, 2022 a copy of the foregoing filed electronically in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system, including Plaintiff's counsel as described below. Parties may access this filing through the Court's system.

Daniel Zemel, Esq.  
Zemel Law, LLC  
660 Broadway  
Paterson, New Jersey 07514

By: /s/ Aaron R. Easley  
*Attorney for Defendant,*  
*Radius Global Solutions, LLC*